



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH/JEA
F. #2014R00196

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 13, 2019

By ECF and Email

Charles D. Swift, Esq.
833 E Arapaho Rd, Suite 102
Richardson, TX 75081
cswift@clcma.org

Sean M. Maher, Esq.
233 Broadway, Suite 820
New York, NY 10279
smaher@seanmaherlaw.com

Re: United States v. Noelle Velentzas and Asia Siddiqui
Criminal Docket No. 15-213 (SJ)

Dear Counsel:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government writes to provide notice of its intention to call several expert witnesses at trial. Specifically, the government intends to call one or more experts on the following subjects:

1. The construction of explosive devices, including but not limited to (i) the knowledge needed to create specific devices; (ii) materials that can be used to create such devices; and (iii) the feasibility of creating such a device with one or more of the items seized from one or both of the defendants.
2. The history of relevant foreign terrorist organizations, including but not limited to al-Qaeda and the Islamic State of Iraq and al-Sham ("ISIS"), including specific acts of terrorism perpetrated by al-Qaeda and ISIS, publications in support of terrorist activities, such as Jihad Recollections and Inspire Magazine, and the history and conduct of specific members, associates or supporters of those organizations that were discussed by one or both defendants.

3. The details of various terrorist attacks and attempted attacks, including the nature of explosive devices used or obtained for those attacks, that were discussed by one or both defendants, including but not limited to (i) the 1995 Oklahoma City bombing; (ii) the 2010 attempted Times Square car bombing; (iii) the 1993 World Trade Center bombing; and (iv) the 2013 Boston Marathon bombing.

The identity, qualifications and bases for the conclusions of each expert will be provided to you when they become available. The government reserves the right to call additional expert witnesses, and will provide advance notice of any intent to do so. If you have any questions or requests, please do not hesitate to contact us.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Craig R. Heeren
Craig R. Heeren
Jonathan E. Algor
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of Court (SJ)